

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

10/18/2017

**SUBJECT:** Acute Toxicity Review for Force of Nature Activator Capsule, EPA Reg. No.: 93040-R

**FROM:** Ian Blackwell, M.S., Biologist  
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Product Science Branch  
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*ILB*

**THRU:** Jenny Tao, Senior Scientist  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Demson Fuller, PM Team 32 / Benjamin Chambliss  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: HCI Cleaning Products, LLC		
Decision No.: 529780	Submission No.: 1003959	E-Sub No.: None
DP No.: 441520		Action Code: A540
MRID No(s): 50290701		

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
013905	7647-14-5	Sodium chloride	20.9
		Other Ingredients	79.1
		Total	100.0

## I) BACKGROUND

The Registrant, HCI Cleaning Products, LLC, has submitted an application for pesticide registration for their product: *Force of Nature Activator Capsule*, EPA Reg. No. 93040-R. In place of actual acute toxicity studies, the registrant has submitted a Bridging Rationale for Acute Toxicity Data Force of Nature Activator Capsule (MRID 50290701). The capsules are used along with the Force of Nature Appliance that uses electricity and potable water to produce a hypochlorous acid solution. The resulting hypochlorous acid solution is used to disinfect, clean and deodorize hard, impermeable surfaces.

## II) RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-35 – Data Matrix (enter date)	<input type="checkbox"/>	<input type="checkbox"/>
Cover letter (5/19/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Basic CSF, (5/17/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (5/24/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
Acute Oral Toxicity Study (OSCPP 870.1100)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Acute Dermal Toxicity Study (OSCPP 870.1200)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Acute Inhalation Toxicity Study (OSCPP 870.1300)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Eye Irritation Study (OSCPP 870.2400)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Skin Irritation Study (OSCPP 870.2500)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Dermal Sensitization Study (OSCPP 870.2600)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: Each of the six acute toxicity studies is addressed by MRID Number 50290701, <u>Bridging Rationale for Acute Toxicity Data Force of Nature Activator Capsule</u> . HCI Cleaning Products, LLC. 5/17/2017.		

## III) FINDINGS/RECOMMENDATIONS

3.1. The proposed product, *Force of Nature Activator Capsules*, contains sodium chloride as the active ingredient along with [REDACTED] inert ingredients, which are common household chemicals at non-toxic concentrations. Based upon public

literature, the acute toxicity profiles of similar products and experience with the ingredients of this product, the Chemistry and Toxicology Team (CTT) assigns the acute toxicity profile below. If the registrant decides that the acute toxicity profile assigned to this product is inappropriate, they may have new acute toxicity studies conducted to demonstrate the desired acute toxicity profile.

3.2 The acute toxicity profile of *Force of Nature Activator Capsule*, EPA Reg. No. 93040-R is currently:

Study	MRID	Toxicity Category	Status
Acute Oral Toxicity	Public literature	III	Cited
Acute Dermal Toxicity	Public literature	III	Cited
Acute Inhalation Toxicity	Public literature	III	Cited
Primary Eye Irritation	Public literature	III	Cited
Primary Skin Irritation	Public literature	III	Cited
Dermal Sensitization	Public literature	Nonsensitizer	Cited

#### IV) PRODUCT LABELING

1) **Signal Word:** CAUTION

2) **HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

“Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye and skin irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using restroom. Remove and wash contaminated clothing before reuse.”

3) **FIRST AID:**

The first aid statement provides information to the pesticide user concerning appropriate first aid for the various routes of exposure in case of accidental exposure. First aid statements include instructions for the user, instructions for the physician, and a telephone number to call for emergency information.

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for treatment advice.

If on Skin or Clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a Poison Control Center or doctor for treatment advice.

If Inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a Poison Control Center or doctor for treatment advice.

If Swallowed:

- Call a Poison Control Center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a Poison Control Center or doctor.
- Do not give anything by mouth to an unconscious person.

“Have product container or label with you when calling a Poison Control Center or doctor for treatment advice.”

“For emergency information on [product, use, etc.], call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.”